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11 *TS-Optics Corporation*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 TS-OPTICS CORPORATION,
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17 Plaintiff,

18 v.
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20 MICROSOFT CORPORATION,
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22 Defendant.
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Case No. 8:24-cv-01974-DOC-DFM

**JOINT STIPULATION FOR
ENTRY OF PROTECTIVE
ORDER**

1 Plaintiff TS-Optics Corporation (“TS-Optics”) and Defendant Microsoft
2 Corporation (“Microsoft”) (TS-Optics and Microsoft collectively, the “Parties”),
3 by and through their undersigned counsel of record, hereby stipulate and request
4 that the Court enter the attached stipulated Protective Order. Good cause exists for
5 the requested Protective Order because discovery in this action is likely to involve
6 production of confidential, proprietary, or private information for which special
7 protection from public disclosure and from use for any purpose other than
8 prosecuting this litigation may be warranted. The Parties have agreed that the
9 attached proposed Order provides appropriate protections for such information.

10 Good cause having been shown, the Parties request that the Court enter the
11 attached Protective Order.

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13 DATED: May 22, 2025

Respectfully submitted,

14 /s/ Benjamin T. Wang

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26 ***TS-Optics Corporation***

27 /s/ Andrew V. Devkar
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CERTIFICATE OF WORD COUNT

The undersigned hereby certifies that the foregoing document contains 112 words, which complies with the word limit of L.R. 11-6.1.

/s/ Benjamin T. Wang

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Civil Rule 5-3.3 and 5.4.

Dated: May 22, 2025

/s/ Benjamin T. Wang
Benjamin T. Wang